

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PAMELA LOVE

Plaintiff,

v.

UNIVERSITY OF SAINT THOMAS

Defendant.

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CIVIL ACTION NO. 20-cv-176

JURY TRIAL DEMANDED

PLAINTIFF'S EXPERT WITNESS DESIGNATION

Plaintiff Pamela Love files her Designation of Expert Witnesses as follows:

1. **Tom Glass**
Senior Litigation Consultant
Briggs & Veselka Co.
901 S. Mopac Expressway
Building II, Suite 450
Austin, TX 78746
Phone: 512-480-8182

Mr. Glass is a Certified Public Accountant who will offer expert testimony regarding Plaintiff's back pay and front pay damages. His expert report, CV, and prior expert witness engagements (in which he testified in the last four years) are attached as Exhibit #1.

2. **Nitin Sud**
SUD LAW P.C.
6750 West Loop South
Suite 920
Bellaire, TX 77401
Phone: 832-623-6420

Mr. Sud will offer expert opinion testimony regarding the reasonableness, necessity, and amount of attorneys' fees incurred by Plaintiff and Plaintiff's entitlement to these fees under the law. Mr. Sud is handling this matter on a contingency basis, but otherwise regularly bills at \$400.00 per hour. It is expected that details of the fees and costs incurred by Plaintiff will be presented to the Court, live or via affidavit, post-trial and assuming Plaintiff is a prevailing party. Mr. Sud may also offer rebuttal testimony to any experts designated by Defendant concerning attorneys' fees.

Mr. Sud's findings, conclusions, opinions, and testimony will be based upon his background, knowledge, experience, and the time expended on the case, the novelty and difficulty of the questions involved in the case, and any other relevant factors as defined by law. It will also be based on rates charged by other attorneys handling employment matters in Texas (*Ex. #2*), prior rulings by courts regarding such fees (*Ex. #3*), and other recent court opinions. Mr. Sud may also base his opinion on all available billing information, as well as the pleadings, discovery, and other documents on file or produced in the case.

Mr. Sud obtained his undergraduate degree from Duke University in 2000, and his law degree from the University of Houston Law Center in May 2005. He is certified by the Texas Board of Legal Specialization in labor and employment law. He has practiced almost exclusively in labor and employment law for over fifteen years, primarily in Houston, TX. He worked at Littler Mendelson, P.C. from September 2005 to June 2010, and then Fulbright & Jaworski LLP (now Norton Rose Fulbright) from June 2010 to May 2013. Mr. Sud opened Sud Law P.C. in May 2013 where he continues to practice labor and employment law, primarily representing employees/plaintiffs in claims against employers. He is a member of the National Employment Lawyers Association (NELA), the Texas Employment Lawyers Association (TELA), and served

as a Council member of the Labor and Employment Section of the Houston Bar Association. He was selected as a Super Lawyer's Texas Rising Star from 2013 – 2017, and a Super Lawyer from 2017 – 2020.

Additional information can be located at <http://www.sudemploymentlaw.com/attorney-resume/>.

Plaintiff may also elicit expert testimony from any and all experts or representatives who have been, or may be, designated by or called by Defendant and who the Court allows to testify.

3. Trang Tran

Tran Law Firm
2537 S. Gessner
Suite 104
Houston, TX 77063
713-223-8855

Mr. Trang may also offer expert opinion testimony regarding the reasonableness, necessity, and amount of attorneys' fees incurred by Plaintiff and Plaintiff's entitlement to these fees under the law. His CV is attached as Exhibit #4.

Plaintiff reserves all additional rights she may have with regard to experts under the Federal Rules of Civil Procedure, the Rules of Evidence, the Local Rules, and the Court's procedures or rulings.

Respectfully submitted,

SUD LAW P.C.

/s/ Nitin Sud

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the following was served upon the following counsel of record *via* email on February 2, 2021:

Carter Crow and Jesika Silva Blanco
Norton Rose Fulbright US LLP
1301 McKinney
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Houston, TX 77010
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/s/ Nitin Sud
Nitin Sud